

FILED

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

SEP 01 2020

U.S. DISTRICT COURT-WVND  
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

ALONZO EUGENE TRAVIS,  
TYRON TERREONO ADAMS,  
DARIUS DASHAWN WADE,  
WILLIE CLARK,  
SCHUYLER DAVIS,  
KYLE ALEXANDER MARTIN,  
KENNETH BURNS,  
JEREMY HAMLIN,  
DONALD NOEL SMITH,  
ALYSSA DEMUS,  
CANDICE MARIE ADAMS,  
CANDIS SANDERS;  
DANIEL MCCLUNG,  
DANIEL MEADOWS,  
ANDREW BENSON,  
LARRY BRUCE HEASTER, and  
LANCE SMITH,  
Defendants.

Criminal No. 1:20cr48

Violations: 21 U.S.C. § 841(a)(1)  
21 U.S.C. § 846

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**(Conspiracy to Distribute Heroin and Cocaine Base)**

From in or about March 2018, to on or about the return of this Indictment, in Monongalia County, within the Northern District of West Virginia, and elsewhere, defendants **ALONZO EUGENE TRAVIS, TYRON TERREONO ADAMS, DARIUS DASHAWN WADE, WILLIE CLARK,**

**SCHUYLER DAVIS, KYLE ALEXANDER MARTIN, KENNETH BURNS, JEREMY HAMLIN, DONALD NOEL SMITH, ALYSSA DEMUS, CANDICE MARIE ADAMS, CANDIS SANDERS, DANIEL MCCLUNG, DANIEL MEADOWS, ANDREW BENSON, LARRY BRUCE HEASTER, and LANCE SMITH,** did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance and heroin, a Schedule I narcotic controlled substance; in violation of title 21, United States Code, Sections 846, and 841(b)(1)(C).

**FORFEITURE ALLEGATION**

*Gun Control Act*

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing or willful violation of Title 18, United States Code, Section 922(g).

*Controlled Substance Act*

1. Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 856, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including the following.

2. Pursuant to Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A true bill,

/s/ \_\_\_\_\_  
Foreperson

/s/ \_\_\_\_\_  
WILLIAM J. POWELL  
United States Attorney

Zelda E. Wesley  
Assistant United States Attorney